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May 26, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: Amendment to Part 61 of
Commission's Rules Requiring
Metric Conversion of Tariff
Publications and Supporting
Information

CC Docket No. 93-55

Dear Ms. Searcy:

Enclosed herewith for filing with the Commission are the original
and four copies of the National Exchange Carrier Association,
Tariff Publications in the above captioned matter.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment to Part 61 of)
Commission's Rules Requiring) CC Docket No. 93-55
Metric Conversion of Tariff)
Publications and Supporting)
Information)

COMMENTS

The National Exchange Carrier Association, Inc. (NECA)¹ submits its comments in response to the Commission's April 8, 1993 Notice of Proposed Rulemaking in the above-captioned proceeding.² The Commission seeks comments on its proposals to conform FCC regulations, specifically Part 61, with the goals of the Metric Conversion Act of 1975. NECA believes that the Commission should adopt Section 61.37 as proposed to provide some flexibility to the ECs who must comply with the metric conversion in their tariffs.

I. BACKGROUND

The Commission seeks to ensure that any regulations or requirements involving measurement-sensitive elements will accommodate the transition to use of the metric system, and that the metric measurement expressions used are both meaningful and practical. The Commission has stated that generally, a carrier

¹ NECA is a not-for-profit, membership association, serving over 1400 local exchange carrier (EC) study areas. NECA members include all local exchange carriers in the United States, Puerto Rico and the U. S. Virgin Islands.

² Amendment of Part 61 of the Commission's Rules Requiring Metric Conversion of Tariff Publications and Supporting Information, CC Docket No. 93-55, Notice of Proposed Rulemaking, (FCC 93-134) released April 8, 1993 (NPRM).

would be required to express measurement-sensitive information in a tariff publication in metric units.³

In its NPRM the Commission requests comments on rules that require carriers to select one of three options for compliance with the Metric Conversion Act.⁴ Under Option 1, a carrier would be required to provide a table for converting non-metric units used in rates and corresponding rates to metric units. Such table would appear in the general rules section of a tariff publication. There would be no requirement that a measurement-sensitive unit or corresponding rate appear in the tariff or supporting information as metric.

Under Option 2, a carrier would be allowed to state the metric unit and corresponding rate in parenthesis beside the non-metric unit and rate in the applicable rate section of the tariff publication. Finally, under Option 3, a carrier both must provide in its tariff a conversion table for converting non-metric units and corresponding rates into metric units and rates, and must clearly show the metric unit and rate in the tariff publication and in all supporting information filed with the Commission.

The Commission recognizes that conversion to metric measure will impose some burdens on carriers and proposes that a two-year conversion period be adopted.⁵ Option 1, according to the Commission, would appear to impose a minimal burden on smaller ECs.⁶

³ NPRM at para. 7.

⁴ Id.

⁵ Id. at paras. 8 and 10.

⁶ Id. at para.10.

II. DISCUSSION

NECA believes that the Commission should adopt the proposed language of Section 61.37 Use of Metric Measurement. This rule as drafted provides exchange carriers with reasonable flexibility to transition to the metric system without undue burdens. Carriers could adopt Option 1 within the two year period set forth by the Commission. As metric units become more generally accepted nationwide and ECs get increased demand for metric measures, the other options could be pursued.

Option 1 is the most practical option presented, especially for the small companies. Options 2 and 3 could result in burdensome changes to the exchange carrier's daily operations and could be costly to the extent systems like CABs billing have to be modified. Having all the options available permits the most flexibility for the exchange carriers and accommodates the goals of the Metric Conversion Act.

NECA agrees with the Commission that Option 1 offers smaller carriers a way to comply with the national metric policy with minimal burden. NECA would prominently feature the table in the front of its tariffs. Customers should not experience confusion from the conversion table suggested in the first option.

III. CONCLUSION

The Commission should adopt Section 61.37 as proposed with the

three options available for metric conversion in exchange carrier tariffs.

Respectfully submitted,

National Exchange Carrier Association, Inc.

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May 26, 1993